

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

W.R. GRACE & CO., et al.,

Debtors.

Chapter 11

Case No. 01-02239 (JKF)
Jointly Administered

Hrg. Date: December 5, 2006

**SUPPLEMENTAL RESPONSE AND OPPOSITION OF MOTLEY RICE LLC TO
DEBTOR'S MOTION TO COMPEL ASBESTOS PERSONAL INJURY CLAIMANTS
REPRESENTED BY EDWARD O. MOODY, P.A., FOSTER & SEAR L.L.P., MOTLEY
RICE LLC, AND WILLIAMS BAILEY LAW FIRM, LLP TO RESPOND TO THE W.R.
GRACE ASBESTOS PERSONAL INJURY QUESTIONNAIRE AND MOTLEY RICE
LLC'S JOINDER IN THE RESPONSES OF VARIOUS LAW FIRMS REPRESENTING
ASBESTOS PERSONAL INJURY CLAIMANTS IN OPPOSITION TO
DEBTOR'S MOTION TO COMPEL**

COMES NOW, Motley Rice LLC, (hereinafter “Motley Rice”) a law firm representing various asbestos personal injury claimants, and hereby files this Supplemental Response and Opposition of Motley Rice LLC to Debtor’s Motion to Compel Asbestos Personal Injury Claimants Represented by Edward O. Moody, P.A., Foster & Sear L.L.P., Motley Rice LLC, and Williams Bailey Law Firm, LLP to Respond to the W.R. Grace Asbestos Personal Injury Questionnaire and Motley Rice LLC’s Joinder in the Responses of Various Law Firms Representing Asbestos Personal Injury Claimants in Opposition to Debtor’s Motion to Compel. Motley Rice respectfully shows the Court as follows:

In further support of its Opposition to W.R. Grace & Co. and its affiliate's (hereinafter "Grace") Motion to Compel, Motley Rice attaches and incorporates herein by reference, Exhibit "A", Declaration of John A. Baden, an attorney with Motley Rice that provides additional

information concerning the basis for Motley Rice's objections to certain questions and instructions contained in Grace's Questionnaire. This declaration details Motley Rice's relationship with consulting experts, Motley Rice's confidentiality policy concerning same, Motley Rice's role in communicating with clients about the client's respective medical condition and the client's case, and also describes confidential settlement agreements that Motley Rice has entered into on behalf of its clients who are also claimants in this matter. *See* Exhibit "A". This evidence further supports and advances Motley Rice's contentions made previously in its Response and Opposition of Motley Rice LLC to Debtor's Motion to Compel Asbestos Personal Injury Claimants Represented by Edward O. Moody, P.A., Foster & Sear L.L.P., Motley Rice LLC, and Williams Bailey Law Firm, LLP to Respond to the W.R. Grace Asbestos Personal Injury Questionnaire and Motley Rice LLC's Joinder in the Responses of Various Law Firms Representing Asbestos Personal Injury Claimants in Opposition to Debtor's Motion to Compel.

WHEREFORE, for the reasons set forth in this response and Motley Rice's earlier Opposition, Motley Rice prays that Debtor's Motion to Compel Asbestos Personal Injury Claimants Represented by Edward O. Moody, P.A., Foster & Sear L.L.P., Motley Rice LLC, and Williams Bailey Law Firm, LLP to Respond to the W.R. Grace Asbestos Personal Injury Questionnaire be denied in its entirety. Motley Rice prays that its objections to the Questionnaire be sustained and that this Court enter a Protective Order that prohibits Debtor from seeking the privileged information sought in its Motion to Compel, and that Motley Rice be granted such other, just, equitable, and necessary relief as this Court deems proper.

Dated: December 1, 2006.

RESPECTFULLY SUBMITTED,

/s/ John Herrick

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